

Cecos #12

Current  
84

APR 04 1996

R-19J

Constance S. Dell  
District Manager  
CECOS International, Inc.  
5092 Aber Road  
Williamsburg, Ohio 45176

Dear Ms. Dell:

The Region has reviewed the results CECOS International, Inc. (CECOS) submitted from the full scale demonstration of the Leachate Treatment System (LTS) at the Williamsburg, Ohio, facility. The results of the demonstration indicate that the LTS can consistently treat the leachate to a concentration of less than 1 ppm polychlorinated biphenyls (PCBs). Based on the submitted information, this letter modifies Condition 12 of the September 12, 1986 PCB landfill Approval to allow the deep well injection of the LTS effluent. This modification is only valid for the leachate which is processed through the LTS. Any leachate which is not processed through the LTS must be treated and disposed as required by the original Condition 12 of the September 12, 1986 PCB disposal Approval. This modification to the TSCA PCB disposal Approval, also, does not relieve CECOS from complying with all other Federal, state and local requirements for the processing and disposal of leachate from the facility. All other conditions of the September 12, 1986 Approval shall remain unchanged.

This Approval modification is being sent to you so that CECOS can immediately implement the changes in the leachate processing and disposal procedures until the amended approval is finalized. If you have any questions, please contact Steve Johnson, of my staff, at (312) 886-1330.

Sincerely yours,

*Original signed by*  
Valdas V. Adamkus

Valdas V. Adamkus  
Regional Administrator

bcc: Steve Johnson ✓  
Ralph McGinnis, Ohio EPA

DRT-14J:SJohnson-6-1330:4/2/96:PTSB\SHARE\CECOS

CONNELL 4/2/96  
REED 4/2/96  
NEIDERGANG 4/13  
ADAMKUS

SWJ 4/2/96

L. D. Dwyer  
4/8/96

URS  
4/11/96

4/12





Cecos #1142  
Leachate  
SS

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B.1

RECEIVED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 11 1994

CECOS INTERNATIONAL  
OHIO DISTRICT

REPLY TO THE ATTENTION OF:

SP-14J

APR 14 1994

Connie Dall, District Manager  
Cecos International Inc.  
5092 Aber Road,  
Williamsburg Ohio  
45176

Dear Ms. Dall,

The Statistical Evaluation of the Pilot Leachate Treatment System, dated March 1993 by Burlington Environmental supports a demonstration that the leachate treatment process proposed at Aber Road, Ohio will remove enough PCBs to deregulate the cleaned fraction under TSCA. Sampling of the leachate treatment process must be done at an "Effluent" site equivalent to LS-3 on the Pilot Plant Treatment system. The blend tested must be equivalent to blend 185, the worst practical case.

#### Findings

- 1) Cecos Inc. satisfactorily removed PCB's from two 1200 gallon pilot plant scale batches of leachate produced at the Aber Road Disposal Site.
- 2) The pilot scale demonstration at Aber Road, Ohio does not dilute leachate to avoid disposal requirements under the Toxic Substance Control Act (TSCA).
- 3) For the particular two pilot batches tested, the two-standard-deviation upper-confidence-limit of the worst case leachate, corrected by the "t" statistic for small populations, is less than 1 ppm at the 95% level of confidence.
- 4) The pilot project did not employ averaging or dilution to lower concentrations below the 1 ppm concentration criterion.
- 5) The process achieved 92%-98% PCB removal and demonstrated that blending of the leachates increases PCB recovery.
- 6) Leachate 185 is the worst practical case leachate produceable at the site. This leachate was designed to test the limits of treatment.

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- 7) Although generating blend 185 during routine pumping operations is possible, blend 305 is more representative of how the Aber Road facility will produce leachate.
- 8) There is little chance of dilution affecting the disposal outcome of this blended product. In the pilot study, PCB concentrations of all 5 observations of sample point Effluent for batches 185 and 304 are reasonably consistent. Therefore, because dilution during statistical compositing of Effluent did not appear to occur and because it was not expected to occur, physical compositing is appropriate for regulatory purposes at the Cecos Aber Road Facility.
- 9) Historical monthly leachate sampling records were used in the Pilot Scale demonstration to assure that batches 185 and 304 were representative and may be used to statistically test for representativity and expected dilution during large scale compositing of the influent streams into the holding tank.
- 10) The large scale demonstration can be expected to achieve the 1 ppm cleanup level with a 95% level of confidence.

Limitation:

- 11) The Pilot scale test only demonstrated the feasibility of Cecos's treatment process and may not substitute for a full scale demonstration.

Conditions:

- 12) A full scale demonstration must be similar to the Pilot Scale demonstration except that at least three acceptable tests of approximately 15,000 gallons each must be run using the treatment system to be certified.
- 13) If during the full scale demonstration, each of five individual observations of the final product of Effluent from three 15,000 gallon leachate runs are less than the 1 ppm PCB threshold then the respective batch may be disposed of as non-TSCA material but only if it is in compliance with all other regulations.
- 14) If, at the 95% confidence level and at the 95% level of significance, the upper confidence limit of all 15 individual observations taken of final product during the full scale trials are less than 1 ppm then monthly sampling of all leachate standpipes at Aber Road may be discontinued. The 5 separate analysis per 15,000 gallon batch of the material in treatment may then be replaced by a composite sample consisting of 5 representative sub-samples per 15,000 gallon batch of the finished Effluent.

- 15) All 5 treatment sub-sample results for each batch must be less than 1 ppm PCB in order to de-regulate each batch material under TSCA demonstration conditions.
- 16) If, during the treatment demonstration, any one of the 5 individual Effluent samples exceeds 1 ppm then Cecos Inc. must provide Region 5 an acceptable explanation. Cecos Inc. then may select another 5 samples from the same 15,000 gallon batch for testing at the 1 ppm level and use that data to replace the first set or it may choose to prepare another 15,000 gallon batch and treat the material as if it were one of the original 3 batches.
- 17) Material that fails the 1 ppm test must be re-treated until it meets the 1 ppm criterion and disposed of appropriately.
- 18) Leachate used in the demonstration program may be disposed of as non-TSCA material if 4 out of 5 samples are less than 1 ppm.
- 19) A replacement 15,000 gallon batch may substitute for the failed batch and the demonstration may continue.
- 20) If there are more individual Effluent sub-sample analytical observations that fail to meet the 1 ppm test then the whole demonstration will be considered a failure and the treatment process must be investigated. A new trial of three 15,000 gallons batches may be prepared after an acceptable explanation is prepared for the failure of the first round of sampling.
- 21) Once per year an efficiency test must be run. The test consists of two five-aliquot composite samples taken of the final finished leachate from a representative 15,000 gallon batch that undergoes treatment. One composite must be taken from the influent stream of the 15,000 gallon settling tank as it is filled and the other composite must be taken of the cleaned product to determine treatment efficiency. The results of this annual efficiency test must be reported on the annual report along with groundwater monitoring.
- 22) The treatment process must be re-certified after 5 years. The closure plan must reflect this.

#### Approvals

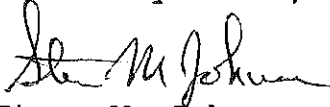
- 23) The full scale demonstration may blend leachates as needed as long as all leachate is treated and subjected to the 1 ppm TSCA PCB Leachate declassification test.
- 24) If the full scale demonstration is successful, Region 5 will approve of the process for operation at the same production rate and with the same additives used in the full scale

demonstration.

- 25) De-regulated material may be disposed of by deep well injection or by any disposal method that is in regulatory compliance.

If you have any questions please feel free to contact me at 886-1330.

Sincerely Yours,



Steve M. Johnson, CPG  
PCB Control

SSPT-7

17 MAY 1989

James R. Stout  
Ohio District Manager  
CECOS International, Inc.  
5092 Aber Road  
Williamsburg, Ohio 45176

Dear Mr. Stout:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the information provided in CECOS International's stabilization plan for Secured Chemical Management Facility (SCMF) No. 11, submitted December 7, 1988.

U.S. EPA is primarily concerned in this matter about the necessity for closing SCMF No. 11 in a manner that is both expeditious and protective of the structural integrity of adjacent secure landfill cells 10 and 8.

U.S. EPA has determined on the basis of its review that improper closure of SCMF No. 11 could result in erosion of the caps and adjacent walls of SCMFs No. 10 and No. 8 and generally undermine their structural integrity. In the interest of eliminating the possibility of a release of any PCBs from these waste cells, U.S. EPA hereby authorizes CECOS International to close SCMF No. 11 in accordance with the submitted (Cell 11 Stability Evaluation) document compiled by Westinghouse Environmental Engineering (CECOS' consultants) and subject to 10 approval conditions. These conditions are designed to protect SCMFs No. 10 and 8 from potential adverse effects of improper Cell No. 11 closure. Therefore, the 10 conditions of this approval constitute conditions of amendment to the September 12, 1986 SCMF No. 10 permit to dispose of PCBs.

The U.S. EPA has the authority under 40 C.F.R. 761.75(c)(3)(ii) regulations covering approvals to impose additional requirements or provisions that are deemed necessary to ensure that operation of the chemical waste landfill does not present an unreasonable risk of injury to health or the environment from PCBs. Under this authority, and with preservation of human health and environment in mind, U.S. EPA hereby imposes the enclosed list of 10 conditions as amendments to the Cell No. 10 approval. Please note that most of these conditions also appear in the Westinghouse document as recommendations.

It is the responsibility of CECOS International, Inc., to ensure that all applicable provisions of the U.S. EPA PCB regulations are followed. Any

Cecos #11

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- 2 -

violation of the enclosed conditions of approval may subject CECOS International, Inc. to enforcement action. Furthermore, this authorization does not relieve CECOS International, Inc. of the responsibility to comply with all Federal, State, or local environmental regulations.

Please contact Mr. Charles Lee of my staff at (312) 886-1771 if you have any questions regarding these matters.

Sincerely,

/s/ original signed by  
Valdas V. Adamkus

Valdas V. Adamkus  
Regional Administrator

Enclosure

cc: Ralph Slone - OEPA, Southwest District Office  
David Combs - OEPA, Southwest District Office

bcc: Bruce Sypniewski - USEPA, RCRA  
Charles Lee - USEPA, P&TSB

LEE \_\_\_\_\_

CONNELL \_\_\_\_\_

REED \_\_\_\_\_

SANDERS \_\_\_\_\_

SSPT-7:LEE:gj:6-1771:4/11/89

STAFF ATTORNEY

SECTION CHIEF

BRANCH CHIEF

DEPUTY REG. COUNSEL

REGIONAL COUNSEL

OTHER

OTHER

GRA  
5/17/89

Carley



CECOS International, Inc.SCMF No. 11 Closure

Amendment to the September 12, 1986 PCB Approval for SCMF No. 10

- 1) Given the concern of U.S. EPA and CECOS' consultants regarding the stability of sand strata (880 sand primarily) exposed by excavation and water withdrawal in Cell No. 11, the in-place program to monitor slope stability and erosion shall be continued throughout the conditions closure/backfill period.
- 2) During Phase I filling operations, engineered factors of safety against base heave (worst case) and against uplift (hydrostatic) shall be at least 1.3 and 2.0, respectively. Documentation of monitored in-place soil densities, soil types and depth of fill emplaced in Cell 11 shall be provided to U.S. EPA in order to assure that the 2.0 safety factor is achieved for Phase I. This documentation shall be provided upon completion of Phase I activities.
- 3) For Phase I, the accumulated water within the excavation shall not be removed until the perimeter dewatering system has been activated.
- 4) The potentiometric level in the Channel Sand must be below approximate elevation 860 ft. before all water is removed from Cell No. 11. The dewatering wells must be kept active throughout Phase I filling operations.
- 5) Any significant 880 Sand Zone that is exposed on the slope and which appears to be subject to slumping must be protected from erosion by construction of a toe berm or fill.
- 6) Once the water has been removed from the cell, the Phase I fill shall be placed as quickly as possible, but no later than 3 months after removal of the water from the cell.
- 7) Completion of both Phase I and Phase II shall be accomplished within 18 months of the date of this approval. This period will allow CECOS to complete their Cell No. 11 closure activities over the course of two construction seasons.
- 8) CECOS shall supply U.S. EPA (PCB Control Section) with a progress report every 2 months until closure activities are completed. The first of these reports shall be due 1 month after this approval is issued.
- 9) For Phase II fill placement, construction methods should be based on final end use of the excavation site. For uses that involve foundations, proper construction control must be maintained to assure that the fill is compacted to at least 90 percent maximum modified dry density. If no construction is planned on the site, or if it is not to be used for parking or staging, the fill surface shall be seeded in a manner similar to that used for other SCMF caps on site. Compaction control should be maintained throughout Phase II activities to minimize potential subsidence problems.

Cecos #11

4/4

- 2 -

- 10) U.S. EPA reserves the right of the Regional Administrator to impose any other future requirements or provisions that are found to be necessary to ensure that operation of the chemical waste landfill does not present an unreasonable risk of injury to health or environment from PCBs.

12 SEP 1986

Mr. Mark A. Monroe  
Ohio District Manager  
CECOS International, Inc.  
5092 Aber Road  
Williamsburg, Ohio 45176

Dear Mr. Monroe:

This letter is in response to your request for approval from the United States Environmental Protection Agency (U.S. EPA), to dispose of polychlorinated biphenyls (PCBs) in Secured Chemical Management Facility (SCMF) No. 10, at the CECOS International, Inc., landfill in Williamsburg, Ohio.

It has been determined that the submitted landfill design drawings issued by Woolpert Consultants on October 29, 1985, the closure and capping plan dated June 4, 1986, and the revised groundwater monitoring program dated December 2, 1985, are consistent with the PCB landfill disposal regulations under the Toxic Substances Control Act (TSCA), 40 CFR Section 761.75. This letter constitutes U.S. EPA authorization, under TSCA and subject to the attached conditions of approval, to dispose of PCBs in SCMF No. 10. The 13 conditions of this approval are given in the enclosure to this letter.

It is the responsibility of CECOS International, Inc., to ensure that all applicable provisions of the U.S. EPA PCB regulations are followed. Any violation of the enclosed conditions of approval may subject CECOS International, Inc., to enforcement action. Furthermore, this authorization only pertains to the solid waste secure landfill design, operation and maintenance, and does not relieve CECOS International, Inc., of the responsibility to comply with all Federal, State, or local environmental regulations.

As discussed during the telephone conversation of Tuesday, September 9, 1986, between Mr. David Petrovski (U.S. EPA) and Mr. J. Stephen Buchanan (CECOS), TSCA leachate will be defined, transported and disposed of in accordance with the enclosed approval conditions. These approval conditions apply to all TSCA leachate obtained from SCMF No. 10, as well as all existing SCMFs and pre-TSCA disposal facilities located at the CECOS International, Inc., facility in Williamsburg, Ohio. Further, these approval conditions will remain in effect until amended in writing by Region V.

-2-

Please contact Mr. Petrovski at (312) 886-1334, if you have any questions regarding these matters.

Sincerely yours,

/s/ original signed by  
Valdas V. Adamkus

Valdas V. Adamkus  
Regional Administrator

Enclosure

cc: Warren W. Tyler, Director  
Ohio Environmental Protection Agency

bcc: J. Connell  
D. Petrovski  
B. Sypniewski  
B. Muno  
D. Mount, Region 6, P&TSB

CONDITIONS OF THE TSCA APPROVAL FOR SCMF NO. 10 AT THE  
CECOS INTERNATIONAL, INC., FACILITY IN WILLIAMSBURG, OHIO

1. Wells associated with the ground water monitoring well nests to be installed near the center of the west and south walls of SCMF No. 10, will be constructed, developed, and deemed capable of yielding adequate and representative ground water samples within 90 days of discontinuing dewatering around the perimeter of SCMF No. 10. The wells shall then be immediately incorporated into the existing TSCA ground water monitoring program at the Williamsburg facility.

The well nest to be placed at the center of the west edge of SCMF No. 10, shall include one well drilled and screened through the bedrock-till interface and the underlying Maysville Group.

A well found incapable of yielding representative or adequate sample volumes will be thoroughly investigated and its deficient performance explained, or it will be replaced. All wells shall be constructed of stainless steel 316 or Teflon, and their design and construction shall conform to the guidelines given in the U.S. EPA draft entitled, "RCRA Ground-Water Monitoring, Technical Enforcement Guidance Document," dated August 1985. The quantity of monitoring well points at each well nest shall be based on the document entitled, "CECOS International TSCA Monitoring Program," dated March 13, 1984.

2. Sampling of the wells adjacent to SCMF No. 10, shall be conducted on the same quarterly interval, and in accordance with the procedures associated with the use of the TSCA wells at the Williamsburg facility.
3. In accordance with the existing TSCA ground water monitoring program at the Williamsburg facility, all ground water and leachate samples from the ground water monitoring wells, underdrain monitoring system, and leachate collection systems for SCMF No. 10 shall be sampled at a minimum for the following parameters:
  - a. pH
  - b. specific conductance
  - c. PCBs
  - d. chlorinated organics
4. Upon closure of SCMF No. 10, CECOS International, Inc., shall initiate monthly determinations of the quantity of leachate produced in each sub-cell of SCMF No. 10.
5. In accordance with existing TSCA procedures at the Williamsburg facility, if elevated levels of PCBs or their chemical derivatives are detected in any ground water monitoring point, underdrain, or dewatering well

-2-

associated with SCMF No. 10, CECOS International Inc., shall notify the Regional Administrator within 1 week of receipt of the results; otherwise, all results shall be incorporated in the TSCA annual report.

6. CECOS International, Inc., shall incorporate the following information regarding SCMF No. 10 into the TSCA annual report submitted to U.S. EPA no later than August 1, for the year ending June 30:
  - a. Types and quantities of PCBs accepted for disposal;
  - b. Total weight of PCB containing material disposed of during the year;
  - c. Final disposition of PCBs accepted for disposal;
  - d. All analytical data from the ground water, underdrain and leachate monitoring locations;
  - e. Volume of leachate produced monthly at each PCB subcell;
  - f. Water table map of the facility based on water levels taken during each sampling event shall include the data from the wells adjacent to SCMF No. 10; and
  - g. Treatment method and final disposal destination of all TSCA leachate as described below.
7. CECOS International, Inc., shall provide prior written notice to the TSCA Program of Region V, if it elects to stop pumping ground water from the dewatering system around SCMF No. 10.
8. No significant modifications may be made to the landfill design or construction as described in the CECOS International, Inc., submittals regarding SCMF No. 10 without the approval of the Regional Administrator of Region V.
9. U.S. EPA reserves the right for its employees, agents, or contractors, to inspect the CECOS International, Inc., land disposal facility in Williamsburg, Ohio, at any reasonable time, and to impose future requirements which the Regional Administrator finds are necessary to ensure that the site does not present an unreasonable risk of injury to health or the environment from PCBs.

#### TSCA Leachate Handling and Disposal

10. Leachate obtained from SCMF No. 10, all existing SCMFs and pre-TSCA disposal facilities located at the CECOS International, Inc. facility in Williamsburg, Ohio, shall be defined as "TSCA leachate" when a representative sample, upon analysis, is found to contain PCB concentrations equal to or exceeding 1 ppm. A representative leachate sample shall be defined as a sample containing an appropriate percentage of all phases present in the leachate.

-3-

11. All phases of a "TSCA leachate" shall be handled and stored in accordance with the TSCA regulations and be disposed of in accordance with 40 CFR Section 761.60.
12. The aqueous phase of a "TSCA leachate" may be treated and disposed of through the multi-media (carbon) filtration system located at the CECOS International, Inc., Spring Grove Processing Center in Cincinnati, Ohio. Disposal of any portion of a "TSCA leachate" obtained at the Williamsburg facility by deep well injection is prohibited.
13. The treatment method and final disposal destination of all "TSCA leachate" obtained from the Williamsburg facility, shall be included in the TSCA annual report.







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

55-P&TSB-16

AUG 27 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George Caine  
District Manager  
CECOS International, Incorporated  
11475 Northlake Drive  
Cincinnati, Ohio 45242

Dear Mr. Caine:

This letter is in regard to the August 2, 1985, letter from the United States Environmental Protection Agency (U.S. EPA) to CECOS International, Inc., (CECOS). As you are aware, the August 2, 1985 letter suspended the July 31, 1981, and the February 6, 1985, Toxic Substances Control Act (TSCA) approvals to dispose of polychlorinated biphenyls (PCBs) at the CECOS landfill on Aber Road in Williamsburg, Ohio.

CECOS responded to the suspension by submitting on August 8, 1985, an amendment request to the April 13, 1984, TSCA approval reinstatement conditions. After reviewing this document, the U.S. EPA presented CECOS officials on August 20, 1985, with a counter groundwater monitoring plan which proposed four additional well nest locations and the replacement of the inadequate MP Series wells. After the submittal by CECOS officials of additional well construction data, a reevaluation of the MP Series wells slated for replacement, and subsequent discussions, CECOS officials agreed to accept a revision of the U.S. EPA monitoring proposal on August 22, 1985.

Based upon these exchanges and subject to the eleven enclosed conditions, as of today, I am reinstating the suspended TSCA approvals to dispose of PCBs at the CECOS landfill in Williamsburg, Ohio. Should the procedures described in conditions 2 through 7 in the attached approval conditions, not be completed by January 1, 1986, without reasonable and documented delays beyond the control of CECOS, this approval reinstatement will expire January 1, 1986; and it will not be reissued until all procedures are completed. In addition, monthly progress reports on this construction project should be submitted to Mr. David Petrovski, of my staff.

ENCLOSURE 7

E-7-1

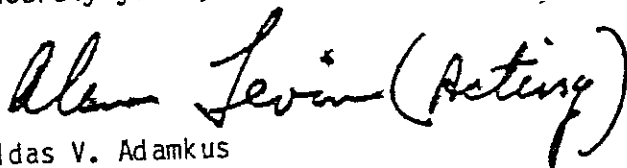
X13366



This approval reinstatement may be withdrawn, or further conditions may be added to it, at any time U.S. EPA has reason to believe that operation of the landfill represents an unreasonable risk of injury to health or the environment. Withdrawal of the approval or the imposition of further conditions may also result from future U.S. EPA rulemaking with respect to PCBs. Moreover, violation of any condition included as part of this document may subject CECOS to enforcement action and/or termination of the approval.

Please contact Mr. David Petrovski, at (312) 886-1334, if you have any questions regarding this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Valdas V. Adamkus (Acting)".

Valdas V. Adamkus  
Regional Administrator

X13367

E-7-2



TSCA DISPOSAL PERMIT REINSTATEMENT CONDITIONS FOR THE CECOS  
INTERNATIONAL LANDFILL IN WILLIAMSBURG, OHIO, AUGUST 27, 1985

1. During the well construction period, groundwater monitoring shall comply with the procedures given in the August 8, 1985 amendment request from CECOS International, Inc. (CECOS) to the United States Environmental Protection Agency (U.S. EPA).
2. CECOS shall install four additional groundwater monitoring nests as follows:

- MP-248 to be located north of disposal cell number 2, at the mid point of the traverse between groundwater monitoring wells M-41 and M-11;
- MP-249 to be located 20 feet from the edge of the intermediate landfill adjacent to monitoring well M-7;
- MP-250 to be located 20 feet east and 90 feet south of the northeast corner of fire pond number 4/5; and,
- MP-251 to be located on the northeast corner of the site's waste management boundary adjacent to the northeast corner of secure cell number 9, as shown on the design drawing entitled "CECOS International TSCA Monitoring Program", dated March 13, 1984.

The quantity of the well points at each of the above well nests shall be based on the March 13, 1984, document, "CECOS International TSCA Monitoring Program." Wells nests MP-248, MP-249, and MP-251 shall include one bedrock well drilled and screened through 10 feet of the underlying Maysville Group.

3. CECOS shall replace the following inadequate [as defined by CECOS and the Ohio Environmental Protection Agency (OEPA)] MP Series wells:

MP-200	MP-213	MP-231 B
MP-203	MP-215 B	MP-233 A
MP-204	MP-216 B	MP-234 A
MP-204 B	MP-220 A	MP-235 B
MP-205	MP-221	MP-235 C
MP-205 A	MP-222	MP-238
MP-205 B	MP-223	MP-238 A
MP-206 A	MP-223 A	MP-240
MP-206 C	MP-227 A	MP-241 A
MP-210	MP-228 A	MP-242 A
MP-211	MP-231 A	

X13068



4. The following wells shall be replaced, drilled, and screened through 10 feet of the underlying Maysville Group:

MP-214	MP-231
MP-217	MP-241
MP-220	MP-244
MP-230	

5. The following well nests shall include one bedrock well drilled and screened through 10 feet of the underlying Maysville Group:

MP-209  
MP-228  
MP-234

6. All new or replacement wells listed in approval conditions 2, 3, 4, and 5 shall be constructed of stainless steel 316, Teflon, or equivalent materials approved by the U.S. EPA, and their design and construction shall conform to the guidelines given in the U.S. EPA draft entitled, "Groundwater - Technical Enforcement Guidance Document," dated March 21, 1985.
7. All of the new or replacement wells listed in conditions 2, 3, 4, and 5 shall be properly developed and will be proven capable of yielding representative groundwater samples for the required parameters, including pH and specific conductance. Specific conductance and pH data will be submitted to the U.S. EPA for review before individual wells will be accepted. Wells yielding water samples with anomalous pH or specific conductance values will not be accepted by the U.S. EPA, unless these values can be shown to be representative of the local groundwater conditions. A well incapable of yielding adequate volumes of water for sampling will be thoroughly investigated, and the low recharge rate adequately explained or, the well shall be replaced. All wells listed above (new and replacement wells) will be constructed, developed, and accepted by the U.S. EPA before January 1, 1986. The U.S. EPA will promptly review all submitted well data.
8. After the termination or relocation of the dewatering activities in the vicinity of cells 8 and 9, analysis of all the following wells shall be initiated within 30 days after groundwater reenters the well:

MP-203	MP-205 D	MP-212 C
MP-203 A	MP-206	MP-212 D
MP-203 C	MP-206 B	MP-213 A
MP-204 A	MP-209	MP-214 B
MP-204 B	MP-210 A	MP-215 A
MP-204 C	MP-211 B	MP-235 A
MP-205	MP-212 A	MP-244 A
MP-205 C	MP-212 B	





Well development data (including pH and specific conductance) will be submitted to the U.S. EPA for review before individual wells will be accepted. Wells found to be inadequate will be replaced within 90 days of testing. All replacement wells will be shown to be capable of yielding adequate and representative groundwater samples.

After the wells have been accepted by the U.S. EPA, they shall be sampled quarterly for PCBs, chlorinated organics, pH, and specific conductance.

9. After the new or replacement wells listed in conditions 2, 3, 4, and 5 are constructed, developed, and accepted by the U.S. EPA, all wells shall be sampled quarterly (beginning January 1, 1986) for PCBs, chlorinated organics, pH, and specific conductance. With the addition of MP-245, MP-229 B, and MP-242, all MP Series wells included in the August 8, 1985 Amendment request from CECOS, and not listed in conditions 2, 3, 4, and 5, shall continue to be monitored quarterly for PCBs, chlorinated organics, pH, and specific conductance.
10. Should any of the procedures outlined in conditions 2, 3, 4, 5, 6, and 7 not be completed by January 1, 1986, without reasonable and documented delays beyond the control of CECOS, this approval reinstatement will expire January 1, 1986, and it will not be reissued until all procedures are completed.
11. Approval conditions, 2 through 13, attached to the April 13, 1984 approval reinstatement letter, shall remain in effect.



Cecos #8  
Missing  
54

U.S. EPA

Region 5

Aug. 2, 1985 (u.s.m., orig.)

CECOS PCB Analysis: Suspended

July 31, 1985

Feb. 6, 1985

Based on Groundwater Mon. Data.

Signed by Valdas Dankas, PA.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

Cecos #17  
Cell 9 Approval

REPLY TO THE ATTENTION OF:  
55-P&TSB-16

FEB 06 1985

Mr. George E. Caine  
General Manager  
CECOS International, Inc.  
11475 Northlake Drive  
Cincinnati, Ohio 45249

Dear Mr. Caine:

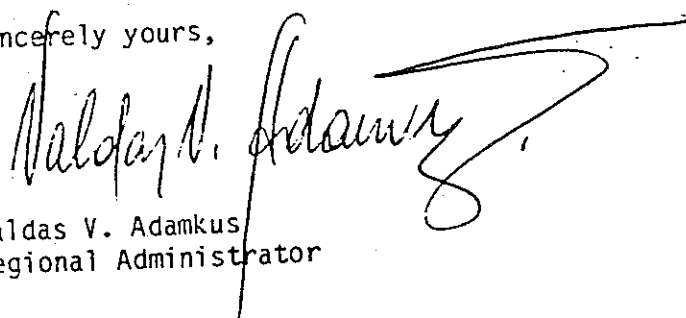
This letter is in response to your request for approval from the United States Environmental Protection Agency (U.S. EPA) to dispose of polychlorinated biphenyl (PCB) contaminated material in Cell No. 9 at the CECOS International Landfill, Williamsburg, Ohio.

This request for approval is consistent with the April 13, 1984, Toxic Substances Control Act approval, which requires CECOS International to obtain approval from U.S. EPA prior to disposing of PCB-contaminated material in any new landfill cell.

Based upon a review of the August 17, 1984, September 20, 1984, and January 7, 1985, plans and documents, the U.S. EPA is granting CECOS International, Inc., approval to dispose of PCB contaminated material in Cell 9.

Please contact Mr. Bill Adams, at (312) 886-1335, if you should have any questions regarding this matter.

Sincerely yours,

  
Valdas V. Adamkus  
Regional Administrator

X13043

ENCLOSURE 5



Aber Road GWM Requirements

TSCA GWM  
+ other Rgts.

Permit

APR 13 1984

RECEIVED  
APR 24 1984

CLERMONT ENVIRONMENTAL  
RECLAMATION

Mr. Richard D. Toftner  
General Manager  
CECOS International  
4479 Spring Grove Avenue  
Cincinnati, Ohio 45232

Cecos #6  
Cell 8 approval  
reinstated

Dear Mr. Toftner:

This letter is in regard to the February 22, 1984, letter from the United States Environmental Protection Agency (U.S. EPA) to CECOS International which suspended the July 31, 1981, Toxic Substances Control Act (TSCA) approval to dispose of polychlorinated biphenyls (PCBs) in any new cell at the Aber Road landfill, Clermont County, Ohio.

CECOS International responded to the suspension by meeting with representatives from U.S. EPA and by submitting a March 7, 1984, document entitled "Short and Long Term Stability and Groundwater Management Program - Proposed SCMF No. 2" and a March 15, 1984, document entitled "CECOS International-TSCA Monitoring Program". These two documents satisfactorily addressed slope stability of the side walls, sealing of sand seams, management of groundwater, groundwater monitoring, and groundwater diversion.

Based upon these submittals, I am reinstating the July 31, 1981, approval to CECOS International subject to the enclosed amendments. The reinstatement of the July 31, 1981, approval is effective today.

This amended approval may be withdrawn, or further conditions may be added to it, at any time U.S. EPA has reason to believe that operation of the landfill represents an unreasonable risk of injury to health or the environment. Withdrawal of the approval or the imposition of further conditions may also result from future U.S. EPA rulemaking with respect to PCBs. Moreover, violation of any condition included as part of this amended approval may subject CECOS International to enforcement action and/or termination of the approval.

Please contact Mr. Richard Karl of my staff, at (312) 286-6143, if you have any questions regarding this matter.

Sincerely yours,

/s/ original signed by  
Alan Levin

Valdas V. Adamkus  
Regional Administrator

Enclosure

cc: Robert Maynard, Ohio Environmental Protection Agency  
Thomas Hinton, Ohio Environmental Protection Agency

ENCLOSURE 4

E-4-1

X13640





CECOS International  
Amendments to the July 31, 1981, PCB Approval

4/24/84

Re-approved PCB Approval at New Rd Site after general review  
re April 1984 EPA comments in letter of 4/15/84

The approval conditions are amended as follows:

1. By May 2, 1984, CECOS International shall install the following groundwater monitoring well nests:

MP 200, MP 201, MP 202, MP 203, MP 204, MP 205, MP 206, MP 207, MP 208, MP 209, MP 210, MP 211, MP 212, MP 213, MP 214, MP 215, MP 216, MP 217, MP 218, MP 219, MP 220, MP 221, MP 222, MP 223, MP 224, MP 225, MP 226, MP 227, MP 228, MP 229, MP 230, MP 231, MP 232, MP 233, MP 234, MP 235, MP 236, MP 237, MP 238, MP 239, MP 240, MP 241, MP 242, MP 243, and MP 244.

All nest locations are depicted on drawing number 1 of 1, "CECOS International TSCA Monitoring Program" dated March 13, 1984, by EA Engineering. The installation techniques and quantity of monitoring well points at each well nest shall be based on the March 15, 1984, document, "CECOS International TSCA Monitoring Program."

2. All groundwater monitoring well points shall be sampled quarterly for PCBs, pH, specific conductance and chlorinated organics beginning May, 1984.
3. As a contingency, in the event that monitoring well points MP 203, MP 204, MP 205, or MP 206 do not contain a sufficient quantity of water to obtain a sample, the eductor system shall be sampled on a quarterly basis for pH, PCBs, specific conductance and chlorinated organics.
4. Monitoring well points M-4, M-11, M-15, M-18, M-21, M-23 and M-24 which have had monthly sampling and analysis can be deleted from the TSCA monitoring program beginning May, 1984.
5. CECOS International shall begin monthly leachate monitoring at L-4, L-5, L-6, L-7, L-10, L-11, L-14, L-15, L-17, L-18, L-20, L-21 and L-22 as depicted on drawing number 1 of 1, "CECOS International TSCA Monitoring Program" dated March 13, 1984, by EA Engineering.
6. CECOS International shall immediately begin monthly volume determinations of the quantity of leachate produced in each PCB sub-cell.
7. CECOS International shall immediately begin quarterly monitoring of underdrains U-5\*, U-6\*, U-7\*, U-8, U-9, U-10, U-11, U-12, U-13, U-14, U-15, U-16, U-17, U-18, U-19, U-20, U-21, and U-22 as depicted drawing number 1 of 1, "CECOS International TSCA Monitoring Program" dated March 13, 1984, by EA Engineering for PCBs, pH, specific conductance and chlorinated organics.
8. CECOS International shall continue the monthly monitoring of stream locations C-6, C-9, C-10, C-11, and C-12 for PCBs, pH, specific conductance and chlorinated organics.

\* If samples can be extracted without endangering human health or the environment.



9. If elevated levels of PCBs are detected in any groundwater monitoring point, underdrain, eductor, or stream sampling location, CECOS International shall notify the Regional Administrator of U.S. EPA within one week of receipt of the results; otherwise, all results shall be incorporated in the annual report.
10. Any accident or lost-time personal injury occurring as a result of PCB land disposal shall be reported in writing to the Regional Administrator of U.S. EPA by the end of the next business day.
11. CECOS International shall consolidate the three annual reports into one annual report that will be due no later than August 1, for the year ending June 30. The annual report shall be submitted to the Regional Administrator of U.S. EPA and shall provide the following information:
  - a. Types and quantities of PCBs accepted for disposal.
  - b. Total weight of PCB containing material disposed of during the year.
  - c. Final disposition of PCBs accepted for disposal.
  - d. All analytical data from the surface water, groundwater, underdrain and leachate monitoring locations.
  - e. Volume of leachate produced monthly at each PCB subcell.
  - f. Water table map of the facility based on water levels taken during each sampling event.
  - g. Permeability results from the three Shelby tube sampling locations which must be taken after each 10 foot vertical rise in the divider berms between subcells.
12. CECOS International shall provide prior written notice and obtain the approval from the Regional Administrator if it elects to stop pumping groundwater from the eductor systems around each cell.
13. U.S. EPA approval shall be required prior to the construction of cells 9 through 17. At least 90 days prior to the anticipated construction of a cell, CECOS International shall submit to U.S. EPA all engineering plans, soil borings and design descriptions associated with the proposed cell for review and approval.



Cecos Sa

Cells  
Suspension

5HW-13

FEB 22 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Richard O. Toftner  
General Manager  
Cecos International, Inc.  
11475 Northlake Drive  
Cincinnati, Ohio 45242

Dear Mr. Toftner:

I am writing this letter to express the concern that the United States Environmental Protection Agency (U.S. EPA) has regarding the disposal of polychlorinated biphenyls (PCBs) in Cell 8 at Cecos International's Aber Road facility, Williamsburg, Ohio.

During a February 7, 1984, Toxic Substances Control Act (TSCA) site inspection, U.S. EPA inspectors found that the west wall of Cell 8 has slumped, exposing sand seams with appreciable quantities of groundwater flowing out of portions of the wall. Based upon all available information, I have reason to believe that the current design of new landfill cells may not meet the required TSCA technical standards, and may pose an unreasonable risk of injury to health or the environment. Because of these concerns, I am suspending the July 31, 1981, TSCA approval to dispose of PCBs in any new cell. This action is taken pursuant to 40 CFR 761.75(c). This suspension will remain in effect until U.S. EPA determines that Cecos International can adequately address slope stability of the side walls, the sealing of all sand seams, and the management of groundwater, including both groundwater monitoring and groundwater diversion. U.S. EPA will evaluate all data submitted to us by Cecos International and then modify, reinstate, or terminate the approval as appropriate.

Please contact William Muno or Richard Karl of my staff, at (312) 886-6136, or (312) 886-6143, respectively, if you have any questions regarding this matter.

Sincerely yours,

Original signed by  
Valdas V. Adamkus

Valdas V. Adamkus  
Regional Administrator

cc: Thomas Winston, OEPA ✓  
Robert Maynard, OEPA ✓



Cecos #5  
"Sand Seam"  
Warning

5HW-13

JAN 17 1984

Mr. Richard O. Toftner  
General Manager  
CECOS International  
4879 Spring Grove Avenue  
Cincinnati, Ohio 45232

Dear Mr. Toftner:

This letter is in regard to the July 31, 1981, Toxic Substances Control Act (TSCA) approval to dispose of polychlorinated biphenyls in secure cells 6 through 17.

Based upon information received from CECOS International and the Ohio Environmental Protection Agency, the U.S. Environmental Protection Agency (U.S. EPA) has determined that a sand seam exists west of cell 6. The sand seam appears to encompass some of the area where cells 9 through 17 are proposed. Because the areal extent and thickness of this sand seam are not well defined, U.S. EPA is concerned with the location and design of each of the proposed cells.

In accordance with Condition 1 on page 4 of the July 31, 1981, Approval, this letter is to notify CECOS International that U.S. EPA approval will be required prior to the construction of cells 9 through 17.

Engineering plans and any soil boring logs utilized to delineate the exact location of the sand seam in relation to each specific cell will be required. All plans and boring logs should be submitted to U.S. EPA at least 90 days prior to the anticipated date of construction of any new cells. U.S. EPA would then evaluate each individual cell location.

U.S. EPA is committed to conducting a timely review and approval process. Please contact Mr. Richard Karl of my staff at (312) 886-6143 if you should have any further questions regarding this matter.

Sincerely yours,

/s/ original signed by  
Alma Levani

Valdas V. Adamkus  
Regional Administrator

cc: Thomas Winston, OEPA  
Tom E. Carlisle, OEPA  
Div. of Hazardous Materials Management

bcc: Dan Banaszek

5HW-13:RKARL:SSM:TH:1/12/84

INITIALS	TYPIST	AUTHOR	STU #1	STU #2	STU #3	TPS	WMB	WMB	WMB
	AS	R. Karl	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF
	1-12-84	1/12/84			WEN	WEN	WEN	WEN	WEN

1-12-84





5AHWM

AUG 26 1981

David S. Santoro, P.E.  
Santoro Engineering Company  
1501 Cincinnati - Batavia Road  
Batavia, Ohio 45103

Dear Mr. Santoro:

Thank you for your August 14, 1981, letter and attached drawing requesting approval of the U.S. Environmental Protection Agency (USEPA), Region V, to modify the design of Secured Cell No. 6 at the Clermont Environmental Reclamation Company (CER Co.) chemical waste landfill near Williamsburg, Ohio.

Your request is made pursuant to the condition of your July 31, 1981, approval to dispose of polychlorinated biphenyls (PCBs) which reads as follows:

Approval to dispose of PCBs is hereby granted to CER Co. subject to the conditions expressed herein, and consistent with the materials and data included in the application filed by the firm. Any departure from the conditions of this approval or the terms expressed in the application must receive the prior written authorization of the Regional Administrator, U.S. Environmental Protection Agency, Region V.

An authorization is hereby granted to alter the construction-design of Secured Cell No. 6 as depicted in Sheet 1 of 1, Secured Cell No. 6 Modified Amphoteric/PCB and Heavy Metals/PCB Subcell Divider Berm, dated July 30, 1981, by Santoro Engineering Company.

This authorization does not affect any other terms or conditions of the July 31, 1981, CER Co. approval to dispose of PCBs.

If you have any questions, please feel free to contact Charles T. Grigalauskis of my staff at (312) 353-2473.

Sincerely,

Original [Signature]  
Valdas V. Adamkus

Valdas V. Adamkus  
Acting Regional Administrator

cc: Wayne Nichols - OEPA





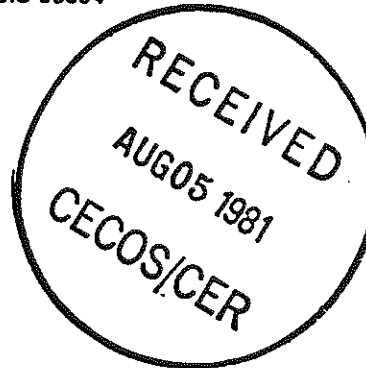
UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

TSCA

Cecos #3  
Cell 6-17  
Approved

REPLY TO ATTENTION OF:  
SAHWM

JUL 31 1981



Mr. I.A. Hoekstra  
Clermont Environmental  
Reclamation Company  
5092 Aber Road  
Williamsburg, Ohio 45176

Dear Mr. Hoekstra:

Pursuant to the Federal Polychlorinated Biphenyl (PCB) Regulations published on May 31, 1979, 40 Code of Federal Regulations Part 761, under the authority of the Toxic Substances Control Act of 1976 (Public Law 94-469), my staff has determined that your application to dispose of PCBs in Secure Cells 6 through 17 satisfies the required technical criteria for disposal of PCBs in a chemical waste landfill.

Please find appended to this letter a document entitled "Approval to Dispose of Polychlorinated Biphenyls (PCBs) in Secure cells 6 through 17." This document permits Clermont Environmental Reclamation Company to proceed with disposing of PCBs in these cells, subject to the listed approval conditions.

I would like to stress that this approval is limited to cells 6 through 17 and only applies to the regulations contained in 40 CFR, Section 761, for chemical waste landfills, and the applicable sections of the Toxic Substances Control Act, Public Law No. 94-469. The approval in no way affects the responsibility of Clermont Environmental Reclamation Company, to fully comply with all other requirements of the Toxic Substances Control Act, the Resource Conservation and Recovery Act, or any other Federal, State, or local environmental legislation.

If you should have any further questions regarding this matter, please contact Mr. Charles Grigalauskis or Dr. Eugene Meyer of my staff at (312) 353-2473/886-6147, respectively.

Sincerely,

  
Valdas V. Adamkus  
Acting Regional Administrator

Attachment

ENCLOSURE 1

E-1-1

X13355

In the Matter of Clermont  
Environmental Reclamation  
Company, Jackson Township,  
Clermont County, Ohio

Approval to Dispose  
of Polychlorinated  
Biphenyls

7/31/81

Authority

1981 Approval  
Cells 6-17

This approval is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act, Public Law No. 94-469, and the Federal PCB Regulations, 40 Code of Federal Regulations (CFR) Section 761, Annex II (44 Fed. Reg., p. 31553 et seq., May 31, 1979).

Findings

1. Clermont Environmental Reclamation Company (CER Co.), proposes to dispose of polychlorinated biphenyls (PCBs) at their chemical waste landfill in Jackson Township, Clermont County, Ohio, in Secure Cells 6 through 17.
2. CER Co. submitted a PCB disposal application for Secure Cells 6 through 17 on March 25, 1981. The U.S. Environmental Protection Agency (USEPA) has previously approved the disposal of PCBs in Secure Cells 3 and 4/5 at the CER Co. facility.
3. On May 20 and May 22, 1981, USEPA published notices in the Clermont Sun, the Cincinnati Post regular edition, the Cincinnati Post valley edition, and the Cincinnati Inquirer, seeking written comments from the public on CER Co.'s PCB disposal application and USEPA's review of this application.
4. Following technical review of all the materials submitted by CER Co., and a review of those statements received as a result of the public comment period, USEPA has determined that the PCB disposal operation of the CER Co. is not likely to present unreasonable risk of injury to the public health or environment from PCBs.
5. All requirements of 40 CFR Section 761, Annex II have been addressed and satisfied, including but not limited to the following:
  - a. 40 CFR Section 761.41(c)(7) (transfer of ownership of subject property);
  - b. 40 CFR Section 761.41(b)(6)(i)(B) and (C) (sampling of surface watercourse);

- c. 40 CFR Section 761.41(b)(6)(iii) (water analysis); and
- d. 40 CFR Section 761.41(b)(8) (chemical waste landfill operations).

The requirements of 40 CFR Section 761 Annex VI (records and monitoring) have also been addressed and satisfied.

Conditions of Approval


1. Disposal of PCBs shall be conducted only in the amphoteric and heavy metals subcells of Secure Cells Nos. 6 through 17. All references to drawings and plans made herein are to those included in the application for PCB disposal site approval.
2. Drums of liquid wastes containing 50 parts per million (ppm) to 500 ppm shall be disposed of by surrounding each container with an amount of inert sorbent material capable of absorbing all the liquid contents of the container in accordance with 40 CFR Section 761.41(b)(~~20(iii)~~ 8 (ii)).
3. Surface water shall be sampled at least monthly at locations C-6, C-9, C-10, C-11, and C-12 as depicted on drawing number 8 of 18, "Monitor Locations," dated 5-21-80 by Santoro Engineering Company.
4. Groundwater shall be sampled at least monthly from wells M-11, M-15, M-18, M-21, M-22, and M-23 as depicted on drawing number 8 of 18, "Monitor Locations," dated 5-21-80 by Santoro Engineering Company.
5. The underdrain systems of Secure Cells 3 and 4/5 shall be monitored and sampled on a quarterly basis. Monitoring shall be conducted at locations U-4, U-9 and U-10 as depicted on drawing number 8 of 18, "Monitor Locations," dated 5-21-80 by Santoro Engineering Company. Data from this monitoring can be used as baseline data for Secure Cells 6 through 17.
6. Pursuant to 40 CFR Section 761.45(b) of Annex VI, an annual report shall be submitted to the Regional Administrator, United States Environmental Protection Agency, Region V, that provides the following information:
  - a. types and quantities of PCBs accepted for disposal;
  - b. name and location of generators of PCB waste accepted for disposal;
  - c. final disposition of PCBs accepted for disposal;
  - d. a summary of the analytical data from all surface and groundwater monitoring locations and all underdrain monitoring specified in this approval;

- e. any changes or modifications in the plans, drawings, specifications, or operational procedures at the facility; and
- f. such additional information as the Regional Administrator may require.

The first annual report for Secure Cells Nos. 6 through 17 shall be received by USEPA no later than one year from the date of this approval.

Waivers

The requested waivers from the following requirements are hereby granted pursuant to 40 CFR Section 761.41(c)(4) following review of all documentation submitted by CER Co.

1. 40 CFR Section 761.41(c)(4)(Annex II) requires for all monitor wells that the annular space between the monitor zone and the surface shall be backfilled with Portland cement or an equivalent material and plugged with Portland cement to effectively prevent percolation of surface water into the well bore. Site monitor wells M-20 (formerly 1 D), M-21 (formerly 2 D), M-4 (formerly 4 D), and M-23 (formerly 5 D), were constructed in accordance with normally accepted guidelines prior to the issuance of 40 CFR Section 761.41(b)(6)(ii)(B), Annex II. The monitor wells were backfilled and plugged with drill cuttings from the annulus consisting of glacial till. USEPA, Region V, has concluded that the physical properties of this material are equivalent to Portland cement in prevention of percolation. Consequently, the material meets the requirements of Section 761.41(c)(4) for backfill. A waiver is granted on the use of Portland Cement as a plug in view of the equivalent protection provided by the glacial till material.
2. 40 CFR Section 761.41(b)(3) requires that the landfill liner system or natural in-place soil barrier shall be at least fifty feet from the historical high water table. The CER Co. site does not meet this requirement. However, USEPA, Region V, has determined that the presence of a double leachate collection and underdrain system and low in-place soil permeabilities will provide a degree of protection such as to prevent an unreasonable risk of injury to health or the environment from disposal of PCBs at the landfill in the absence of compliance with Section 761.41(b)(3).
3. 40 CFR Section 761.41(b)(1)(iv) & (v), Annex II, requires that the landfill site soil possess a Liquid Limit value greater than 30 and a Plasticity Index rating greater than 15. While the recompacted yellow clay bottom of the site cells is characterized by parameters that equal or exceed the values required by Section 761.41(b)(1)(iv) and (v), the five-foot recompacted till or hardpan material used in the remolded sidewall does not meet the requirements. However, the requested waiver of Section 761.41(b)(1)(iv) and (v) requirements for the sidewall soil is granted because of the following factors: 

- a. The site is located in a "thick, relatively impermeable formation such as large area clay pans" thereby satisfying 40 CFR Section 761.41(b)(1).
- b. The in-place soil thickness varies from approximately 25 to 50 feet, and the recompacted soil liner thickness is five feet. This exceeds the requirement of Section 761.41(b)(1)(i).
- c. The permeability of the recompacted liner is  $1 \times 10^{-7}$  cm/sec or less which exceeds the requirement of 40 CFR Section 761.41(b)(1)(ii).
- d. The artificial liner has a minimum thickness of 60 mils, which exceeds the requirement of 40 CFR Section 761.41(b)(2).

USEPA, Region V, has determined, in view of these factors, that the operation of the landfill site for the disposal of PCBs without satisfying the requirements of Section 761.41(b)(iv) and (v) for cell site sidewalls will not present an unreasonable risk of injury to health or the environment.

#### Approval

1. Approval to dispose of PCBs is hereby granted to CER Co. subject to the conditions expressed herein, and consistent with the materials and data included in the application filed by the firm. Any departure from the conditions of this approval or the terms expressed in the application must receive the prior written authorization of the Regional Administrator, U.S. Environmental Protection Agency, Region V.
2. USEPA may require additional surface water, groundwater, and underdrain monitoring of Secure Cells Nos. 6 through 17 at any time during the future operation and development of the facility.
3. CER Co. shall notify USEPA 30 days prior to commencement of disposal operations in each of the Secure Cells 6 through 17.
4. This approval to dispose of PCBs does not relieve CER Co. of the responsibility to comply with all applicable State and local regulations. This approval may be rescinded at any time for failure to comply with the terms and conditions herein, or for any other good cause.

7/31/81

DATE

Valdas V. Adamkus  
Acting Regional Administrator





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

Date: **MAY 9** 1980

Subject: PCB Disposal Site Approval, CECOS International, Inc.,  
Clermont County, Ohio

From: *fw* David Kee, Director  
Air and Hazardous Materials Division

*Karl J. Heppitsch Jr.*

To: John McGuire  
Regional Administrator

It is my recommendation that you sign the attached cover letter to CECOS International, Inc., for approval to dispose of PCBs at the Clermont Environmental Reclamation Company chemical waste landfill.

The USEPA 30-day public comment period on the merits of the application, and USEPA's review concluded on April 26, 1980. Although no substantive comments were received during the comment period, all comments have been responded to and are available for review in the Waste Management Branch files.

This approval is substantially the same as your September 29, 1979, approval for portions of Secured Landfill No. 3. There is one additional waiver request which I recommend be granted. 40 CFR Sections 761.41(b)(1), (iv) and (v) require that the Liquid Limit be greater than 30 and the Plasticity Index be greater than 15. The re-compacted bottom of Secured Landfill Nos. 4/5 meets or exceeds these criteria, but the re-compacted side walls do not. However, the thickness of the artificial lines exceeds the requirement for same.

CECOS submitted a February 4, 1980, addendum to the application for approval for Secured Landfill Nos. 4/5. and previously approved Secured Landfill No. 3. The addendum requested a waiver of 40 CFR 761.41(b)(8) which requires that other wastes placed in the landfill that are not chemically compatible with PCBs and PCB items including organic solvents shall be segregated from the PCBs throughout the waste handling and disposal process. USEPA, Region V, asked for, and obtained comments from the Illinois State Geological Survey and the USEPA Municipal Environmental Research Laboratory. Based upon the comments received, it is recommended that the above-referenced waiver request be denied.

Attachments

Cover Letter to Mr. I. A. Hoekstra, CECOS International, Inc.  
Approval for CECOS to dispose of PCBs.





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST  
CHICAGO, ILLINOIS 60604

Cecos #2  
Cell 2,3,4/5  
2/5

REPLY TO ATTENTION OF

MAY 9 1980

Mr. I. A. Hoekstra, General Manager  
CECOS International, Inc.  
5092 Aber Road  
Williamsburg, Ohio 45176

MAY 12 1980

CECOS/CER

Re: Approval to Dispose of  
Polychlorinated Biphenyls (PCBs)


Dear Mr. Hoekstra:

We have completed our review of the February 4, 1980, application submitted by Santoro Engineering Company on behalf of CECOS International, Inc. (formerly Newco Chemical Waste Systems of Ohio, Inc./CER) for approval to dispose of PCBs in cells 2 and 3 of Secured Landfill Nos. 4/5 at your chemical waste landfill in Jackson Township, Clermont County, Ohio.

A determination has been made to approve, with conditions, the disposal of PCBs. The enclosed approval delineates the required conditions, and responds to each of your requests for waivers, including one which is denied.

This approval is made pursuant to the regulations contained in 40 CFR, Part 761, for chemical waste landfills, and the applicable sections of the Toxic Substances Control Act, Public Law No. 94-469. The approval in no way affects the responsibility of CECOS International, Inc. to fully comply with all other requirements of the Toxic Substances Control Act, the Resource Conservation and Recovery Act of 1976, or any other Federal, State, or local environmental legislation.

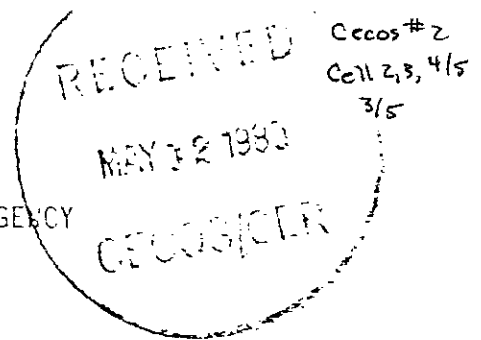
Sincerely,

  
John McGuire  
Regional Administrator

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V



In the Matter of  
CECOS International, Inc.

}  
}  
}  
Approval to Dispose  
of Polychlorinated Biphenyls  
(PCBs)

Authority

This approval is given pursuant to Section 6(e)(1) of the Toxic Substances Control Act, Public Law No. 94-469, and 40 CFR, Section 761, Annex II (44 Federal Register 31514 et. seq., May 31, 1979).

Findings

1. CECOS International, Inc. (CECOS), proposes to dispose of polychlorinated biphenyls (PCBs) at the Clermont Environmental Reclamation (CER) Company chemical waste landfill in Jackson Township, Clermont County, Ohio.
2. All requirements of 40 CFR, Part 761, will be met, including but not limited to the following:
  - a. 40 CFR, Section 761.45 (maintenance of records, monitoring).
  - b. 40 CFR, Section 761.41(c)(7) (transfer of ownership of subject property).
  - c. 40 CFR, Section 761.41(b)(6)(i)(B) and (C) (sampling).
  - d. 40 CFR, Section 761.41(b)(6)(iii) (water analysis).
  - e. 40 CFR, Section 761.41(b)(8) (landfill operation).
3. On February 4, 1980, CECOS submitted an application for approval to dispose of PCBs. On subsequent dates, CECOS submitted additional information to remedy deficiencies in their application.
4. On March 26, 1980, the U.S. Environmental Protection Agency (USEPA) published notices in the Clermont Sun, the Clermont Courier, the Cincinnati Post regular edition, and the Cincinnati Inquirer, seeking written comments from the public on CECOS' application and USEPA's review.
5. After review of all the materials submitted by CECOS, and those statements received as a result of the public comment period, USEPA has determined that the operation of the landfill will not present an unreasonable risk of injury to health or environment from PCBs.



Conditions

6. Disposal of PCBs shall be conducted only in Secured Landfill Nos. 4/5 as indicated in drawing CD-41A (Secured Landfill Nos. 4/5 Plan & Longitudinal Section, February 8, 1979) and only in those portions of Secured Landfill Nos. 4/5 designated as Cell No. 2 (Heavy Metals/PCB) and Cell No. 3 (Amphoteric/PCB). All documentary references are made to materials included in your application for approval to dispose of PCBs.
7. Drums of liquid wastes containing 50 parts per million (ppm) to 500 ppm PCBs shall be disposed of by surrounding each container with an amount of inert absorbent material capable of absorbing all the liquid contents of the container in accordance with 40 CFR, Section 761.41(b)(8)(iii).
8. Surface water shall be sampled at least monthly at locations 1, 2, 3, 4, 5, and 6, as depicted in Exhibit A-10 of the Supplemental Report dated July 13, 1978.
9. Groundwater shall be sampled at least monthly from monitor wells 2D, 3D, 4D, 5D, 5S, 11D, and 15D, as depicted on drawing CD-25 (Soils Investigation Summary-- Monitor Well Location and Data, January 9, 1979) and monitor well number 36 as indicated in drawing CD-41A (Secured Landfill Nos. 4/5 Plan and Longitudinal Section, February 8, 1979).
10. In accordance with 40 CFR, Section 761.41(c)(3)(ii), the following additional requirements are hereby made a condition of approval.

Report the following information to the Regional Administrator, Region V, on an annual basis:

- a. Types and quantities of PCBs accepted for disposal.
- b. Name and location of generators of PCBs accepted for disposal.
- c. Final disposition of PCBs accepted for disposal.
- d. A summary of the analytical data from all surface and groundwater monitoring locations specified in this approval.
- e. Any changes or modifications in the plans, drawings, specifications, or operational procedures at the facility.
- f. Such additional information as the Regional Administrator may require.

The first annual report shall be received by USEPA no later than 30 days after one year from the date of this approval.

Any changes or modifications in the plans, specifications, or operational procedures at the facility must receive prior approval, in writing, from the Region V PCB Disposal Site Coordinator.


Cecos #2  
Cell 2,3,4/5  
4/5





Waivers

The following waivers of requirements have been requested and are hereby granted pursuant to 40 CFR, Section 761.41(c)(4):

11. Monitor wells 1, 2, 4, and 5, were constructed in accordance with normally accepted guidelines prior to the issuance of 40 CFR, Section 761.41(b)(6) (iii)(6), which requires that monitor wells be backfilled with Portland cement. These wells are backfilled with drill cuttings from the annulus consisting of glacial till, which will serve equally well the purpose of preventing hydraulic connection between the surface and the sampling points.
12. 40 CFR, Section 761.41(b)(3) requires that "the bottom of the landfill shall be above the historical high groundwater table" and "... at least 50 feet from the historical high water table." This site does not meet that requirement, but the landfill was constructed to be unaffected by seasonal groundwater fluctuations. 
13. 40 CFR, Section 761.41(b)(1)(iv) and (v) requires that the Liquid Limit be greater than 30; and Plasticity Index be greater than 15. The recompacted side walls do not meet these two criteria. However, the landfill is located in a thick, relatively impermeable formation such as large-area clay pans as specified in 40 CFR Section 761.41(b)(1). The landfill has an artificial liner thickness of 36 mil which exceeds the criteria under 40 CFR 761.41(b)(2). This waiver is only for the recompacted side walls of Secured Landfill Nos. 4/5.

→ The following waiver of a requirement has been requested and is hereby denied pursuant to 40 CFR, Section 761.41(c)(4).

14. 40 CFR, Section 761.41(b)(8)(i) requires that "other wastes placed in the landfill that are not chemically compatible with PCBs and PCB items including organic solvents shall be segregated from the PCBs throughout the waste handling and disposal process." The evidence submitted in the February 4, 1980, Addendum to PCB Application Secured Landfill Nos. 4/5 failed to adequately demonstrate that the granting of this waiver would not pose an unreasonable risk of injury to health or the environment.

Approval

15. Approval is hereby granted to CECOS International, Inc., to dispose of PCBs at the Clermont Environmental Reclamation Company chemical waste landfill, in Jackson Township, Clermont County, Ohio, subject to the conditions expressed herein, and consistent with the materials and data included in the application filed by the firm. Any departure from the conditions of this approval or the terms expressed in the application must receive the prior written authorization of the U.S. Environmental Protection Agency, Region V.
16. This approval to dispose of PCBs does not relieve CECOS International, Inc. of the responsibility to comply with all applicable State and local regulations. This approval may be rescinded at any time for failure to comply with the terms and conditions herein, or for other good cause.

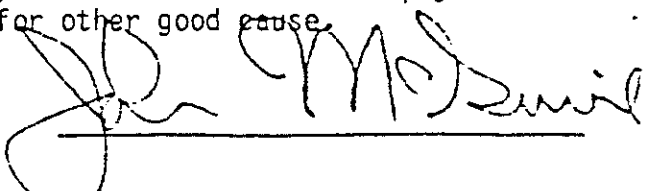
MAY 9 1980

DATE

REGIONAL ADMINISTRATOR

Recos #2  
Cell 2,3,4/5  
5/5

MAY 12 1980





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

In the Matter of  
Newco Chemical Waste  
Systems of Ohio, Inc.

Approval to Dispose  
of Polychlorinated  
Biphenyls

Authority

This approval is given pursuant to Section 6(e)(1) of the Toxic Substances Control Act, Public Law No. 94-469, and 40 CFR, Section 761, Annex II (43 Fed. Reg. 7105 et. seq., May 31, 1979).

Findings

1. Newco Chemical Waste Systems of Ohio, Inc. (Newco), proposes to dispose of polychlorinated biphenyls (PCBs) at the Clermont Environmental Reclamation (CER) Company chemical waste landfill in Jackson Township, Clermont County, Ohio.
2. All requirements of 40 CFR, Section 761, Annex II will be met, including but not limited to the following:
  - a. 40 CFR, Section 761.45 (maintenance of records, monitoring).
  - b. 40 CFR, Section 761.41(c)(7) (transfer of ownership of subject property).
  - c. 40 CFR, Section 761.41(b)(6)(i)(B) and (C) (sampling).
  - d. 40 CFR, Section 761.41(b)(6)(iii) (water analysis).
  - e. 40 CFR, Section 761.41(b)(8) (landfill operation).
3. Newco submitted a PCB disposal application on July 26, 1978. On subsequent dates Newco submitted additional information to remedy deficiencies in their application.
4. On May 23, 1979, the U. S. Environmental Protection Agency (USEPA) published notices in the Clermont Sun, the Clermont Courier, the Cincinnati Post regular edition, the Cincinnati Post valley edition, and the Cincinnati Inquirer, seeking written comments from the public on Newco's application and USEPA's review.
5. After review of all the materials submitted by Newco, and those statements received as a result of the public comment period, USEPA has determined that the operation of the CER-Newco landfill will not present an unreasonable risk of injury to health or environment from PCBs.

Cecos #1  
(Newco)  
Cell 2,3

SEP 28 1979

Mr. James B. Wessel  
General Manager, Newco Chemical  
Waste Systems of Ohio, Inc.  
5092 Aber Road  
Williamsburg, Ohio 45176

Re: Approval to Dispose of  
Polychlorinated Biphenyls (PCBs)

Dear Mr. Wessel:

We have completed our review of the application submitted by Newco Chemical Waste Systems of Ohio, Inc., for approval to dispose of PCBs at the Clermont Environmental Reclamation Company chemical waste landfill in Jackson Township, Clermont County, Ohio.

A determination has been made to approve with conditions the disposal of PCBs. The approval, delineating the required conditions, is enclosed.

I would like to stress that this approval only applies to the regulations contained in 40 CFR, Section 761, for chemical waste landfills, and the applicable sections of the Toxic Substances Control Act, Public Law No. 94-469. The approval in no way affects the responsibility of Newco Chemical Waste Systems of Ohio, Inc., to fully comply with all other requirements of the Toxic Substances Control Act, the Resource Conservation and Recovery Act, or any other Federal, State, or local environmental legislation.

I appreciate your cooperation, and that of Newco Chemical Waste Systems of Ohio, Inc., in this matter.

Sincerely yours,

/S/ Original Signed By John McGuire

John McGuire  
Regional Administrator

Enclosure

cc: Donald Day, Chief  
Office of Land Pollution Control  
Ohio Environmental Protection Agency


bcc: Gardebring / Bryson  
Kee / Klepitsch / Goldstein

5A&HMD:CTG:PGR:9/21/79:WMB

*for MB*  
*10/17/79*  
*9-27-79*  
*9/26/79*  
*9/27/79*  
*9/24/79*  
*9-21-79*

### Waivers

The following waivers of requirements have been requested and are hereby granted pursuant to 40 CFR, Section 761.41(c)(4):

11. Monitor wells 1, 2, 4, and 5, were constructed in accordance with normally accepted guidelines prior to the issuance of 40 CFR, Section 761.41(b)(6)(iii)(6), which requires that monitor wells be backfilled with Portland cement. These wells are backfilled with drill cuttings from the annulus consisting of glacial till, which will serve equally well the purpose of preventing hydraulic connection between the surface and the sampling points.
12. 40 CFR, Section 761.41(a)(3) requires that "the bottom of the landfill shall be above the historical high groundwater table" and "...at least 50 feet from the historical high water table." This site does not meet that requirement, but the landfill was constructed to be unaffected by seasonal groundwater fluctuations. 

### Approval

13. Approval to dispose of PCBs is hereby granted to Newco Chemical Waste Systems of Ohio, Inc., subject to the conditions expressed herein, and consistent with the materials and data included in the application filed by the firm. Any departure from the conditions of this approval or the terms expressed in the application must receive the prior written authorization of the U. S. Environmental Protection Agency, Region V.
14. This approval to dispose of PCBs does not relieve CER-Newco of the responsibility to comply with all applicable State and local regulations. This approval may be rescinded at any time for failure to comply with the terms and conditions herein, or for other good cause.

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DATE

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REGIONAL ADMINISTRATOR

Conditions

6. Disposal of PCBs shall be conducted only in Secure Landfill #3 as indicated in drawing CD-12 (Plot Plan, January 30, 1979), and only in those portions of Secure Landfill designated as Cell #3 (Amphoteric) and Cell #2 (Heavy Metals) in drawing CD-13 (Typical Plan: Secure Landfill, January 30, 1979). All documentary references are made to materials included in your application for PCB disposal site approval.
7. Drums of liquid wastes containing 50 parts per million (ppm) to 500 ppm PCBs shall be disposed of by surrounding each container with an amount of inert absorbent material capable of absorbing all the liquid contents of the container in accordance with 40 CFR, Section 761.41(b)(8)(iii).
8. Surface water shall be sampled at least monthly at locations 1, 2, 3, 4, 5, and 6, as depicted in Exhibit A-10 of the Supplemental Report dated July 13, 1978.
9. Groundwater shall be sampled at least monthly from wells 20, 30, 40, 50, 55, 110, and 150, as depicted on drawing CD-25 (Soils Investigation Summary--Monitor Well Location and Data, January 9, 1979).
10. In accordance with 40 CFR, Section 761.41(c)(3)(ii), the following additional requirement is hereby made a condition of approval:

Report to Regional Administrator, Region V, on an annual basis, the following information:

- a. Types and quantities of PCBs accepted for disposal.
- b. Name and location of generators of PCB waste accepted for disposal.
- c. Final disposition of PCBs accepted for disposal.
- d. A summary of the analytical data from all surface and groundwater monitoring locations specified in this approval.
- e. Any changes or modifications in the plans, drawings, specifications, or operational procedures at the facility.
- f. Such additional information as the Regional Administrator may require.

The first annual report shall be received by USEPA no later than one year from the date of this approval.

Mr. James B. Wessel  
General Manager  
Newco Chemical Waste Systems of Ohio, Inc.  
5092 Aber Road  
Millsburg, Ohio 45170

Newco's Original  
Cell 2 and Cell 3

Re: Approval to Dispose of  
Polychlorinated Biphenyls (PCBs)

Dear Mr. Wessel:

Approval is hereby granted to Newco Chemical Waste Systems, Inc., Louis E. Wagner, President, to dispose of polychlorinated biphenyls (PCBs), at the Clermont Environmental Reclamation Company chemical waste landfill in Jackson Township, Clermont County, Ohio. This approval is given pursuant to 56(e)(1) of the Toxic Substances Control Act, Pub. L. No. 94-469, and 40 CFR §761, Annex II (43 Fed. Reg. 7105 et. seq., May 31, 1979) and is subject to the following terms and conditions.

1. Disposal of PCBs shall be conducted only in Secure Landfill #3 as indicated in drawing CD-12 (Plot Plan, January 30, 1979), and only in those portions of Secure Landfill designated as Cell #3 (Amphoteric) and Cell #2 (Heavy Metals) in drawing CD-13 (Typical Plan: Secure Landfill, January 30, 1979). All documentary references are made to materials included in your application for PCB disposal site approval.


2. Drums of liquid wastes containing 50 ppm to 500 ppm PCBs shall be disposed of by surrounding each container with an amount of inert sorbent material capable of absorbing all the liquid contents of the container in accordance with 40 CFR §761.41(b)(3)(ii). ?

3. Surface water shall be sampled at least monthly at locations 1, 2, 3, 4, 5 and 6 as depicted in Exhibit A-10 of the Supplemental Report dated July 13, 1978.

4. Groundwater shall be sampled at least monthly from wells 2D, 3D, 4D, 5D, 5S, 11D and 15D as depicted on drawing CD-25 (Soils Investigation Summary - Monitor Well Location and Data, January 9, 1979).

5. All requirements of 40 CFR § 761, Annex II shall be met, including but not limited to the following:

DES 9/14/79

 9/14/79





40 CFR § 761.46 (maintenance of records, monitoring).

40 CFR § 761.41 (c)(7) (transfer of ownership of subject property).

40 CFR § 761.41(b)(6)(i)(B) and (C) (sampling).

40 CFR § 761.41(b)(6)(iii) (water analysis).

40 CFR § 761.41(b)(8)(landfill operation).

In accordance with 40 CFR § 761.41(c)(3)(ii), the following additional requirement is hereby made a condition of approval:

Report to Regional Administrator, Region V, on an annual basis, the following information:

1. Types and quantities of PCBs accepted for disposal.
2. Name and location of generators of PCB waste accepted for disposal.
3. Final disposition of PCBs accepted for disposal.
4. A summary of the analytical data from all surface and ground water monitoring locations specific in this approval letter.
5. Any changes or modifications in the plans, drawings, specifications, or operational procedures at the facility.
6. Such additional information as the Regional Administrator may require.

The first annual report shall be received by USEPA no later than one year from the date of this approval.

The following waivers of requirements have been requested and are hereby granted pursuant to 40 CFR § 761.41(c)(4):

1. Monitor wells 1, 2, 4 and 5 were constructed in accordance with normally accepted guidelines prior to the issuance of 40 CFR § 761.41(b)(6)(iii)(B), which requires that monitor wells be backfilled with Portland cement. These wells are backfilled with drill cuttings from the annulus consisting of glacial till, which will serve equally well the purpose of preventing hydraulic connection between the surface and the sampling points.

2. 40 CFR § 761.41(a)(3) requires that "the bottom of the landfill shall be above the historical high groundwater table" and "at least fifty feet from the historical high water table." This site does not meet that requirement, but the landfill was constructed to be unaffected by seasonal groundwater fluctuations.





I hereby find that the operation of the CER-Newco landfill will not present an unreasonable risk of injury to health or environment from PCBs even though the above regulatory requirements are not met, and those requirements are therefore waived. This approval does not relieve CER-Newco of the responsibility to comply with all applicable State and local regulations.

This approval may be rescinded at any time for failure to comply with the terms and conditions herein or for other good cause.

Sincerely,

John McGuire  
Regional Administrator

5A&MD:JN:CTGrigalowski:dschlitz

